

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF OKLAHOMA
3 EQUILLA M. BROTHERS, as the Personal)
4 Representative and Administratrix of)
5 The Estate of Daryl Clinton, Deceased))
6 Plaintiff,)
7 -vs-) No. 5:2021-cv-418
8 (1) TOMMIE JOHNSON III, in his)
9 official capacity as Oklahoma County)
10 Sheriff,)
11 Defendant.)
12 _____)

11 **CERTIFIED COPY**

13 DEPOSITION OF CHRISTOPHER HENDERSHOTT

14 TAKEN ON BEHALF OF THE PLAINTIFF

15 IN NORMAN, OKLAHOMA

16 ON MARCH 15, 2023

17 COMMENCING AT 2:02 P.M.

18 INSTASCRIP, LLC
19 125 PARK AVENUE, LL
20 OKLAHOMA CITY, OKLAHOMA 73102
21 (405) 605-6880
22 www.instascript.net

23 REPORTED BY: LORI JOHNSTON HARSTAD, CSR
24
25

<div>1 APPEARANCES Page 2</div> <div>2 FOR THE PLAINTIFF:</div> <div>3 Geoffrey Tabor 4 Attorney at Law 5 Madison Smith 6 Legal Intern 7 Ward & Glass, LLP 8 1601 36th Avenue NW 9 Suite 100 10 Norman, OK 73072 11 geoffrey@wardglasslaw.com</div> <div>12 FOR THE DEFENDANT:</div> <div>13 Rodney J. Heggy 14 Assistant District Attorney 15 Office of the District Attorney-Oklahoma County 16 320 Robert S. Kerr 17 Suite 505 18 Oklahoma City, OK 73102 19 Rod.heggy@oklahomacounty.org</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1 STIPULATIONS Page 4</div> <div>2</div> <div>3 It is hereby stipulated and agreed by and between</div> <div>4 the parties hereto, through their respective attorneys,</div> <div>5 that the deposition of Christopher Hendershott may be taken</div> <div>6 on behalf of the Plaintiff on March 15, 2023, in Norman,</div> <div>7 Oklahoma, by Lori Johnston Harstad, Certified Shorthand</div> <div>8 Reporter within and for the State of Oklahoma, pursuant to</div> <div>9 subpoena.</div> <div>10 It is further stipulated and agreed by and between</div> <div>11 the parties hereto, through their respective attorneys,</div> <div>12 that all objections, except as to the form of the question</div> <div>13 or the responsiveness of the answer, are reserved until the</div> <div>14 time of trial, at which time they may be made with the same</div> <div>15 force and effect as if made at the time of the taking of</div> <div>16 this deposition.</div> <div>17</div> <div>18</div> <div>19 *****</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>
<div>1 INDEX Page 3</div> <div>2 WITNESS PAGE:</div> <div>3 Christopher Hendershott:</div> <div>4 Direct Examination by MR. TABOR 5:5</div> <div>5 EXHIBITS</div> <div>6 NO.: DESCRIPTION: PAGE:</div> <div>7 For Deposition:</div> <div>8 1 Special Investigations Unit 9 investigative report of Sergeant 10 Jennifer Peek, OCSO-000117 to '139: 11 For Identification 15:13</div> <div>12</div> <div>13</div> <div>14</div> <div>15</div> <div>16</div> <div>17</div> <div>18</div> <div>19</div> <div>20</div> <div>21</div> <div>22</div> <div>23</div> <div>24</div> <div>25</div>	<div>1 CHRISTOPHER HENDERSHOTT, Page 5</div> <div>2 Of lawful age, having been first duly sworn, deposes and</div> <div>3 says in reply to the questions propounded as follows:</div> <div>4 DIRECT EXAMINATION</div> <div>5 BY MR. TABOR:</div> <div>6 Q Good afternoon, Mr. Hendershott. My name is</div> <div>7 Geoffrey Tabor. We have met. I will be primarily taking</div> <div>8 your deposition today.</div> <div>9 Could you state your full, legal name for the</div> <div>10 record, please.</div> <div>11 A Christopher Raymond Hendershott.</div> <div>12 Q Okay. And have you ever given a deposition</div> <div>13 like this before?</div> <div>14 A No. I don't believe I have.</div> <div>15 Q Okay. I am going to go over a few quick ground</div> <div>16 rules and get you out of here sooner, hopefully. As you</div> <div>17 see, you're under oath. There's a court reporter here</div> <div>18 typing out everything we say. So to make sure we have a</div> <div>19 clean record, if you will let me finish what I am saying</div> <div>20 and then you can start. I will do the same for you. It</div> <div>21 will be a little mechanical back and forth so we have a</div> <div>22 clean record, rather than us interrupting each other.</div> <div>23 A Okay.</div> <div>24 Q That's kind of the easiest way to do it.</div> <div>25 If you could say "yes" or "no" or a clear</div>

<p style="text-align: right;">Page 6</p> <p>1 verbal response, that's better than "uh-huh" or, like, a</p> <p>2 shake of the head. If you do say something like that,</p> <p>3 that's okay. I will just ask you to clarify. I am not</p> <p>4 picking on you.</p> <p>5 If you need a break, let me know. I just ask</p> <p>6 that you fully answer the pending question before we go off</p> <p>7 the record, but I don't expect you to be here very long.</p> <p>8 Are you suffering from any type of medical</p> <p>9 condition or under the influence of any substance that</p> <p>10 would affect you giving clear testimony today?</p> <p>11 A No.</p> <p>12 Q Okay. You're of sound mind today. Right?</p> <p>13 A Yes.</p> <p>14 Q Could you just give me a really general</p> <p>15 overview, 30,000-foot overview, of your educational</p> <p>16 history?</p> <p>17 A High school education plus CLEET.</p> <p>18 Q And where did you graduate from high school?</p> <p>19 A Ada High School.</p> <p>20 Q Okay. Well, I didn't know that. You better</p> <p>21 look out. I am from Ardmore.</p> <p>22 A Uh-oh.</p> <p>23 Q We've got a little rivalry brewing here.</p> <p>24 What year or years did you go to CLEET?</p> <p>25 A Went to CLEET in 2012.</p>	<p style="text-align: right;">Page 8</p> <p>1 A Armed security and a reserve police officer.</p> <p>2 Q Okay. And who are you -- what department are</p> <p>3 you reserve for?</p> <p>4 A I was with Custer City.</p> <p>5 Q Okay.</p> <p>6 A I am no longer there.</p> <p>7 Q Okay. Did you do anything -- I know we sent</p> <p>8 you the subpoena for today. Have you done anything else to</p> <p>9 prepare for today's deposition, or just show up?</p> <p>10 A I looked on the Google and Googled the person's</p> <p>11 name and read the News 9 article on them.</p> <p>12 Q Daryl Clinton?</p> <p>13 A Yes.</p> <p>14 Q Have you talked to any of the other detention</p> <p>15 officers? County personnel?</p> <p>16 A No.</p> <p>17 Q Let's talk about -- let's say as of 2019, when</p> <p>18 you were last at the jail, if you could give me a basic</p> <p>19 hierarchy from the detention officers up to the sheriff on</p> <p>20 the jail operation side. Tell me how that worked.</p> <p>21 A Oh, man. Well, detention officers were the</p> <p>22 backbone of it. They sat there, they did all the work.</p> <p>23 You had corporals and sergeants also doing all the work.</p> <p>24 Corporals would be assigned to a floor, whatever floor the</p> <p>25 shift commander wanted them to. Sergeant would be assigned</p>
<p style="text-align: right;">Page 7</p> <p>1 Q 2012. Okay.</p> <p>2 Now, tell me -- let's kind of go from 2012 to</p> <p>3 present. Tell me about your work history.</p> <p>4 A 2012, I was a sergeant with the Oklahoma County</p> <p>5 Sheriff's Office in the detention center, assigned to the</p> <p>6 Disciplinary Grievance Unit. When I went to CLEET, did</p> <p>7 that for about another year before I made lieutenant/shift</p> <p>8 commander inside the Oklahoma County Detention Center.</p> <p>9 I worked there until I retired December 31st,</p> <p>10 2019, but I was also on the Dignitary Protection Unit.</p> <p>11 THE REPORTER: I'm sorry. Did you say</p> <p>12 "dignitary protection"?</p> <p>13 THE WITNESS: Dignitary Protection Unit, the</p> <p>14 Oklahoma County Gang Intelligence Unit, and I was Crisis</p> <p>15 Intervention Team.</p> <p>16 Q (By Mr. Tabor) And so what time frame were you</p> <p>17 at the Oklahoma County Jail? You were there until December</p> <p>18 31st, 2019.</p> <p>19 When did you first start there?</p> <p>20 A Very first started there in November of 1995.</p> <p>21 Q Okay.</p> <p>22 A And then I left County in 2003 or '4. 2004,</p> <p>23 April of 2004. Then I came back in August of 2007.</p> <p>24 Q Okay. And tell me what have you done in terms</p> <p>25 of work since December 31st of 2019?</p>	<p style="text-align: right;">Page 9</p> <p>1 to a floor by administration, and they would be in charge</p> <p>2 of that floor. Lieutenants would be in charge of a shift.</p> <p>3 After that, you had captains above us, who were</p> <p>4 in charge of the operations of the whole jail, and a major</p> <p>5 above them. And then, after that, it would be the</p> <p>6 undersheriff and sheriff that did whatever they did.</p> <p>7 Q Okay. Could you tell me kind of generally the</p> <p>8 nature and purpose of sight checks at the jail? Tell me</p> <p>9 about that.</p> <p>10 A To make sure the inmates are physically okay</p> <p>11 and to make sure the security of the facility is intact.</p> <p>12 Q Okay. During your time with the jail, tell me</p> <p>13 the training, if any, that you got regarding sight checks.</p> <p>14 A Basically, in the classroom, they talk about</p> <p>15 them. They tell you what to look for. You look for</p> <p>16 movement, look for breathing, look for the color of the</p> <p>17 skin. You look at the jail surroundings, the cell</p> <p>18 surroundings, make sure nothing is out of the ordinary.</p> <p>19 Then when you got to the jail, when you're on your training</p> <p>20 phase, you go -- you go around with someone. They just</p> <p>21 tell you kind of what to look for and show you, and that's</p> <p>22 it.</p> <p>23 Q And when you talk about the training you're</p> <p>24 describing just now in the classroom, is that CLEET?</p> <p>25 A No.</p>

<p>1 Q Okay.</p> <p>2 A That's from the Oklahoma County Sheriff's</p> <p>3 Office, their training division.</p> <p>4 Q Okay. And how often did you receive that type</p> <p>5 of training on sight checks?</p> <p>6 A Initial academy, and that's it.</p> <p>7 Q Okay. And would you agree with me that a</p> <p>8 proper sight check is intended, in part, to ensure the</p> <p>9 safety and security of the inmates?</p> <p>10 A Absolutely.</p> <p>11 Q And you would agree with me that it's accurate</p> <p>12 to say that performing a reasonable sight check, the</p> <p>13 detention staff has got to pay attention to the condition</p> <p>14 of the inmate?</p> <p>15 A Yes.</p> <p>16 Q Now, as a part of a reasonable sight check,</p> <p>17 would you expect the detention staff to pay attention to</p> <p>18 the appearance and the behavior of the inmate?</p> <p>19 A Yes.</p> <p>20 Q And as part of a reasonable sight check, would</p> <p>21 you expect detention staff to pay attention to what could</p> <p>22 be a potential medical emergency?</p> <p>23 A Yes.</p> <p>24 Q Okay. And you would agree with me paying</p> <p>25 attention to those sorts of things are important for the</p>	<p>Page 10</p> <p>1 Jail, is it your understanding that the detention staff,</p> <p>2 they were not expected to render medical care or make</p> <p>3 medical-related decisions for inmates? Right?</p> <p>4 A Well, I wouldn't say that. I mean, if someone</p> <p>5 is in need of immediate medical assistance, I expect that</p> <p>6 the officer would intervene right then.</p> <p>7 Q So you would say that --</p> <p>8 A Whether it be, you know, performing CPR or at</p> <p>9 least calling for medical over the radio to get a nurse and</p> <p>10 gurney in there.</p> <p>11 Q So you would agree that there is some</p> <p>12 involvement by the detention staff on medical issues,</p> <p>13 depending on the situation?</p> <p>14 A Yes.</p> <p>15 Q And that may, depending on the situation,</p> <p>16 exceed just calling the medical staff. Right?</p> <p>17 A Yes.</p> <p>18 Q Okay. And that -- that is your understanding</p> <p>19 of the duties that are on the detention staff as a</p> <p>20 lieutenant, former lieutenant working at the jail.</p> <p>21 Correct?</p> <p>22 A Yes.</p> <p>23 Q And I already asked you this a little bit, so I</p> <p>24 apologize if I am repeating myself, but tell me the</p> <p>25 training, if any, the detention staff at the jail had</p>
<p>Page 11</p> <p>1 detention officer. Correct?</p> <p>2 A Yes.</p> <p>3 Q If a particular detention officer, let's say,</p> <p>4 is doing their sight checks, sees an inmate with a</p> <p>5 potentially serious medical problem, and there's a shift</p> <p>6 change on whoever the rover is, is it your understanding,</p> <p>7 does the sheriff's office expect there to be some type of</p> <p>8 exchange of information there or --</p> <p>9 A Yes.</p> <p>10 Q Okay. And why is that?</p> <p>11 A Well, you always do pass-on to alert the next</p> <p>12 shift on possible situations that might come up.</p> <p>13 Q Now, as of 2019, your time there at the jail,</p> <p>14 did the detention staff have any training on detainee or</p> <p>15 inmate medical care?</p> <p>16 A Just your basic CPR and First Aid.</p> <p>17 Q Okay. Anything else other than basic CPR and</p> <p>18 First Aid?</p> <p>19 A How to use an AED. That was about it.</p> <p>20 Q Did the detention staff ever get any training</p> <p>21 from the County about when to call 911, if ever, regarding</p> <p>22 an emergency medical situation?</p> <p>23 A Detention staff doesn't do that. The shift</p> <p>24 commander would do that.</p> <p>25 Q During your experience at the Oklahoma County</p>	<p>Page 12</p> <p>1 regarding recognizing and responding to medical health</p> <p>2 emergencies.</p> <p>3 A Well, you know, you're taught, you know, to</p> <p>4 observe someone. If they look to be in medical distress,</p> <p>5 you notify medical. You know, that could be the color of</p> <p>6 the skin. That could be their behavior. It could be a</p> <p>7 number of things.</p> <p>8 Q In your experience at the jail, did any of the</p> <p>9 detention staff anywhere along the chain, did they have any</p> <p>10 decision-making process regarding referrals or transports</p> <p>11 to outside medical facilities for inmates?</p> <p>12 A No.</p> <p>13 Q So in your understanding of how the jail</p> <p>14 operated, the County expected all of that decision making</p> <p>15 to be on the medical provider. Correct?</p> <p>16 A Unless it was a life-threatening medical</p> <p>17 emergency. Then the shift commander would usually go ahead</p> <p>18 and make that call.</p> <p>19 Q So you would agree with me there's some</p> <p>20 situations where the detention staff can play a role on the</p> <p>21 transfer process. Correct?</p> <p>22 A The shift commander. Yes.</p> <p>23 Q And in order for that to happen, it's my</p> <p>24 understanding there needs to be some type of reporting up</p> <p>25 the chain of command. Right?</p>

<p>Page 14</p> <p>1 A Yes.</p> <p>2 Q And you said "the shift commander." Is that</p> <p>3 right?</p> <p>4 A Yes. What would happen in a medical emergency</p> <p>5 -- say someone is not breathing. The shift commander would</p> <p>6 go ahead and call EMSA. But then after making that call</p> <p>7 and getting it rolling, you would immediately call the duty</p> <p>8 officer and let them know what's going on.</p> <p>9 If it wasn't a life-threatening emergency and</p> <p>10 the shift commander felt that this inmate needed to go out</p> <p>11 but medical didn't, you would relay it up to your captain.</p> <p>12 And wherever it goes from there, it goes.</p> <p>13 Q So if there is either a disagreement with</p> <p>14 medical or medical is maybe not doing their job, there is</p> <p>15 still a process, as you understand, for it to go up the</p> <p>16 chain of command on the detention staff side. Right?</p> <p>17 A Yes.</p> <p>18 Q Okay. And so it wouldn't be accurate to say,</p> <p>19 you know, the detention staff, as long as they just make</p> <p>20 the medical staff known of an emergency, the detention</p> <p>21 staff isn't necessarily done there. They just can't wash</p> <p>22 their hands in that scenario. Right?</p> <p>23 A No.</p> <p>24 Q And just to be clear -- I know what you're</p> <p>25 saying. Just to make sure -- we've got a written</p>	<p>Page 16</p> <p>1 refresh your memory. Right?</p> <p>2 A Correct.</p> <p>3 Q Okay. You were interviewed by Sergeant</p> <p>4 Jennifer Peek as a part of this investigation. Correct?</p> <p>5 A I guess so. I don't remember.</p> <p>6 Q Okay. But after reviewing page 11 -- OSCO 127</p> <p>7 is the Bates -- of this investigation, you don't have any</p> <p>8 reason to doubt the context of your interview portion?</p> <p>9 A No.</p> <p>10 Q Okay. Did reviewing any of this, of your</p> <p>11 interview here with Sergeant Peek, did this refresh your</p> <p>12 recollection at all about this night? Do you remember</p> <p>13 this?</p> <p>14 A No, I do not.</p> <p>15 Q Okay. Before August 2019 at the jail, do you</p> <p>16 recall -- and I am not just talking about you. I am not</p> <p>17 picking on you or anything.</p> <p>18 But do you recall any patterns or instances</p> <p>19 where detention officers weren't doing their sight checks</p> <p>20 properly?</p> <p>21 A Absolutely.</p> <p>22 Q Okay. Tell me a little more about that.</p> <p>23 A The jail was extremely short-handed. And there</p> <p>24 were probably a lot of sight checks missed, whether it be</p> <p>25 due to short-handedness, some -- sometimes there were</p>
<p>Page 15</p> <p>1 transcript and there's a -- make sure we don't have a</p> <p>2 double negative there.</p> <p>3 You would agree with me that the detention</p> <p>4 staff just can't call medical and wash their hands of the</p> <p>5 situation. Correct?</p> <p>6 A That's correct.</p> <p>7 Q Okay. Thank you.</p> <p>8 Because if, in some situations, it's apparent</p> <p>9 that medical is not doing their job or neglecting an</p> <p>10 inmate, there is still a duty to make sure that inmate gets</p> <p>11 taken care of. Right?</p> <p>12 A Yes.</p> <p>13 (Exhibit 1 marked for identification)</p> <p>14 Q (By Mr. Tabor) I am introducing Exhibit 1 to</p> <p>15 your deposition. I think you've already got a copy here.</p> <p>16 This is the investigative report of the death of</p> <p>17 Mr. Clinton.</p> <p>18 Now, I know you have slept quite a bit since</p> <p>19 this, since October of 2019, but have you given a general</p> <p>20 look-over of this investigation?</p> <p>21 A Of my portion. Yes.</p> <p>22 Q Okay. And what page are you on there?</p> <p>23 A Page 11, very top.</p> <p>24 Q And I believe you mentioned you Googled</p> <p>25 Mr. Clinton's death before coming in here, to try to</p>	<p>Page 17</p> <p>1 officers assigned one officer per two floors. It just</p> <p>2 wasn't possible to get them done in a timely fashion and</p> <p>3 feed and pass meds and do everything else. And then there</p> <p>4 were occasions where officers just neglected their duties.</p> <p>5 Q And was that a concern that you had about how</p> <p>6 things were being run at the jail?</p> <p>7 A Absolutely.</p> <p>8 Q And from your experience at the jail going all</p> <p>9 the way back to the nineties, could that short-handedness</p> <p>10 and pattern of not doing sight checks properly, could that</p> <p>11 impact the safety of certain inmates?</p> <p>12 A Absolutely.</p> <p>13 Q And did you still even have those concerns</p> <p>14 about those things when you left the sheriff's department</p> <p>15 in December of 2019?</p> <p>16 A Even more so, because we were extremely</p> <p>17 short-handed then.</p> <p>18 Q Okay. And so would you say, over your time</p> <p>19 there at the jail, you had become increasingly concerned</p> <p>20 about the -- those matters?</p> <p>21 A Not only sight checks but the safety of the</p> <p>22 staff and everyone there.</p> <p>23 Q During your career there at the jail, did</p> <p>24 anyone raise concerns about improper sight checks or</p> <p>25 understaffing?</p>

<p style="text-align: right;">Page 18</p> <p>1 A Yes.</p> <p>2 Q Okay. Tell me what you remember about that.</p> <p>3 A Well, I mean, I did, as lieutenant, to my</p> <p>4 captains almost weekly. Other lieutenants would complain</p> <p>5 about it. The captains knew that we were shorthanded.</p> <p>6 They knew the sight checks weren't getting done properly.</p> <p>7 And it just was going on repeat after repeat.</p> <p>8 Q And then, from your perspective, that never</p> <p>9 really got better? In fact, it sounds like, from your</p> <p>10 perspective, it got worse. Right?</p> <p>11 A Yep. Yes. Sorry.</p> <p>12 Q Kind of on this topic of things in your career</p> <p>13 that troubled you about the jail and how it was being run,</p> <p>14 tell me anything else that you voiced your concerns about</p> <p>15 or you thought were not being done right.</p> <p>16 A Okay. There was a particular instance where my</p> <p>17 partner at the time, Lieutenant Chairs, had written up a</p> <p>18 female officer for abandoning her post, which was medical</p> <p>19 13 Adam, which had suicidal females, pregnant females, and</p> <p>20 mental health females in there, because she had class to go</p> <p>21 to. And she had an evening class twice a week for 16</p> <p>22 weeks, I believe it was.</p> <p>23 And Lieutenant Chairs had let her off every</p> <p>24 single time except for one time she couldn't because we</p> <p>25 were too shorthanded. And the officer basically said, "I</p>	<p style="text-align: right;">Page 20</p> <p>1 During your time working at the jail, did you</p> <p>2 ever have any concerns about medical needs of inmates being</p> <p>3 met?</p> <p>4 A Oh, yeah.</p> <p>5 Q Tell me about that a little bit.</p> <p>6 A Just some of the nurses up there just didn't</p> <p>7 seem like they cared. They didn't seem like they believed</p> <p>8 anything the inmates said. And I am -- and I know that</p> <p>9 there were inmates that played the system. But sometimes,</p> <p>10 you know, you just -- it just didn't -- it didn't add up.</p> <p>11 Q Tell me your thoughts about the time at your</p> <p>12 career at the jail with Turnkey Health.</p> <p>13 A I think County went with the lowest bidder and</p> <p>14 a lot of the nurses there shouldn't be in the nursing</p> <p>15 profession.</p> <p>16 Q Were there -- during your tenure there, when</p> <p>17 Turnkey was contracted, were there ever concerns raised</p> <p>18 about the quality of care being given by Turnkey?</p> <p>19 A Yes.</p> <p>20 Q Okay. Tell me what you remember about that.</p> <p>21 A The inmates complained about it constantly.</p> <p>22 And, you know, even -- even me as lieutenant, if you put in</p> <p>23 a word at the clinic, "Hey, can you guys see this person?"</p> <p>24 "Oh, they were seen earlier in the day. We</p> <p>25 don't need to see them."</p>
<p style="text-align: right;">Page 19</p> <p>1 am leaving anyways," and left and sent her a text message</p> <p>2 saying something to the effect of "fuck Oklahoma County.</p> <p>3 It's not worth me staying. I am going to my class." And</p> <p>4 she left those inmates without anyone in there, and they</p> <p>5 were 15-minute sight checks.</p> <p>6 And Lieutenant Chairs wrote her up and took it</p> <p>7 to Captain Sedbrook. And nothing was being done about it.</p> <p>8 About two weeks later, I talked to Captain Sedbrook about</p> <p>9 it, confronted him about it, you know, because he -- and</p> <p>10 asked him what was being done. And he said, "Oh, that's on</p> <p>11 the sheriff's desk right now. She's going to be</p> <p>12 terminated."</p> <p>13 I said, "So that report is on the sheriff's</p> <p>14 desk right now?"</p> <p>15 He said, "Yes."</p> <p>16 I said, "Then why is it right there on your</p> <p>17 desk?"</p> <p>18 He looked me in the eyes and got all flustered</p> <p>19 and stated, "You know, we can't just write everyone up for</p> <p>20 making a mistake. We have to retain the officers we have."</p> <p>21 And I said, "Well, that's the problem. You</p> <p>22 guys don't have our back." And then the next day I came</p> <p>23 in, I was transferred back to graveyards.</p> <p>24 Q You were what?</p> <p>25 A Transferred back to graveyards.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q So it sounds like, to me, over the years on</p> <p>2 some of the concerns you voiced, that you spoke up about</p> <p>3 these things. Right?</p> <p>4 A Yes.</p> <p>5 Q Do you feel that the County took your concerns</p> <p>6 seriously and addressed them?</p> <p>7 A My captains, not so much.</p> <p>8 MR. TABOR: Okay. I will pass the witness at</p> <p>9 this time.</p> <p>10 MR. HEGGY: I have no questions.</p> <p>11 MR. TABOR: Mr. Hendershott, you have a right</p> <p>12 to get your deposition transcript, the written transcript,</p> <p>13 that can be sent to you and you can review it and correct</p> <p>14 it if there's any transcription errors, or you have the</p> <p>15 right to waive that process and just stand on what's been</p> <p>16 transcribed today. It's your decision.</p> <p>17 THE WITNESS: I will stand.</p> <p>18 MR. TABOR: Okay. So you will waive reading</p> <p>19 and signing?</p> <p>20 THE WITNESS: Yes.</p> <p>21 MR. TABOR: Okay. Thank you, sir.</p> <p>22 (Deposition concluded at 2:26 p.m. and witness excused</p> <p>23 after 24 minutes on the record)</p> <p>24</p> <p>25</p>

1 C E R T I F I C A T E

2 STATE OF OKLAHOMA)
) SS:
3 COUNTY OF OKLAHOMA)

4

5 I, Lori Johnston Harstad, a Certified Shorthand
6 Reporter for the State of Oklahoma, certify that
7 Christopher Hendershott was by me sworn to testify the
8 truth; that the deposition was taken by me in stenotype and
9 thereafter transcribed by computer and is a true and
10 correct transcript of the testimony of the witness; that
11 the deposition was taken by me on March 15, 2023, at
12 2:02 p.m., at 1601 36th Avenue NW, Norman, Oklahoma; that I
13 am not a relative, employee, attorney or counsel to any
14 party in this case or a relative or employee to any counsel
15 in this case or otherwise financially interested in this
16 action; and that the witness waived his right to review the
17 deposition transcript prior to its filing.

18 Witness my hand and seal of office on this 17th day
19 of March, 2023.

20

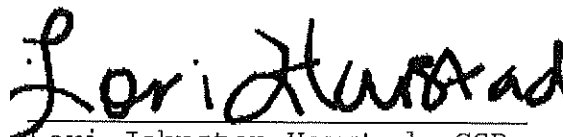
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Lori Johnston Harstad, CSR
Oklahoma Certified Shorthand Reporter
Certificate Number 1726
Expiration Date: December 31, 2023

Oklahoma CSR #01726
My Commission Expires 12/31/2022